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CLERK, U.S. DISTRICT COURT
ST. PAUL, MINNESOTAUNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

Catherine Dahlberg

18-cv-2244 JNL/TNL

Plaintiff(s), X1

vs.

Michelle Batt

and

Erika Shell Castro

and

Tosha Regional Directors Defendant(s), X3

(Enter the full name(s) of ALL plaintiffs and defendants in this lawsuit. Please attach additional sheets if necessary.) of Marti, Inc.

Case No. _____
(To be assigned by Clerk of District Court)DEMAND FOR JURY
TRIALYES ☒ NO ☐**EMPLOYMENT DISCRIMINATION COMPLAINT**

PARTIES

1. List your name, address and telephone number. Do the same for any additional plaintiffs.

a. Plaintiff

Name Catherine Dahlberg

Street Address Lot 2304

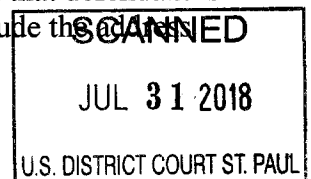
County, City P.O. Box 17370
Ramsey, Saint Paul

State & Zip Code MN 55117

Telephone Number 612-239-8426

(Safe at Home
participant—
physical address is
reserved from records)

2. List all defendants. You should state the full name of the defendant, even if that defendant is a government agency, an organization, a corporation, or an individual. Include the address.



where each defendant may be served. Make sure that the defendant(s) listed below are identical to those contained in the above caption.

- a. Defendant No. 1 *Michelle Batt*
officer of Martti Inc.
 Name
1103 Schrock Road Suite 200
 Street Address
Columbus OH 43229
 County, City
 State & Zip Code
- b. Defendant No. 2 *Erika Shell Castro*
officer of Martti Inc.
 Name
1103 Schrock Road Suite 200
 Street Address
Columbus OH 43229
 County, City
 State & Zip Code

NOTE: IF THERE ARE ADDITIONAL PLAINTIFFS OR DEFENDANTS, PLEASE PROVIDE THEIR NAMES AND ADDRESSES ON A SEPARATE SHEET OF PAPER.

Check here if additional sheets of paper are attached: ☒ (

Please label the attached sheets of paper to correspond to the appropriate numbered paragraph above (e.g., Additional Defendants 2.c., 2.d., etc.)

JURISDICTION

The Court has jurisdiction over this action under 28 U.S.C. § 1331.

3. This employment discrimination lawsuit is based on (check only those that apply):

- a. ☒ Title VII of the Civil Rights Act of 1964, as amended, 42 U.S.C. §§ 2000e, *et. seq.*, for employment discrimination on the basis of race, color, religion, gender, or national origin. **NOTE:** *In order to bring suit in federal district court under Title VII, you must first obtain a right to sue letter from the Equal Employment Opportunity Commission (EEOC).*
- b. ☐ Age Discrimination in Employment Act of 1967, as amended, 29 U.S.C. §§ 621, *et. seq.*, for employment discrimination on the basis of age (age 40 or older). **NOTE:** *In*

attachment to page 2

Defendant No. 3

Tosha

Name

Officer of Martti, Inc.

street Address

1103 Schrock Road Suite 200

County, City

Columbus OH 43229

state, zip Code

order to bring suit in federal district court under the Age Discrimination in Employment Act, you must first file charges with the Equal Employment Opportunity Commission (EEOC).

- c. ☐ Americans with Disabilities Act of 1990, as amended, 42 U.S.C. §§ 12101, *et. seq.*, for employment discrimination on the basis of disability. **NOTE:** *In order to bring suit in federal court under the Americans with Disabilities Act, you must first obtain a right-to-sue letter from the Equal Employment Opportunity Commission (EEOC).*
- d. ☐ Rehabilitation Act of 1973, as amended, 29 U.S.C. §§ 701, *et. seq.*, for employment discrimination on the basis of a disability by an employer which constitutes a program or activity receiving federal financial assistance. **NOTE:** *In order to bring suit in federal district court under the Rehabilitation Act of 1973, you must first file charges with the appropriate Equal Employment Office (EEO) representative or agency.*
- e. ☐ Other (Please describe.)
4. If you are claiming that the discriminatory conduct occurred at a location other than the defendant's address above, please provide the following information on where the conduct occurred:
- 554 Minnesota Street #1500
 Saint Paul, MN 55101
 (Street Address) Ramsey (City/County) (State) (Zip Code)

5. When did the discrimination occur? Please give the date or time period:

September - December 2017

ADMINISTRATIVE PROCEDURES

6. Did you file a charge of discrimination against the defendant(s) with the Equal Employment Opportunity Commission or other federal agency?
- a. ☒ Yes Date filed: 2/10/2018
- b. ☐ No
7. Have you received a Notice of Right-to-Sue Letter?

- a. ☒ Yes If yes, please attach a copy of the letter to this complaint.
- b. ☐ No

NATURE OF THE CASE

8. The conduct complained of in this law suit involves (check only those that apply):

- a. ☐ Failure to hire me
- b. ☒ Termination of my employment
- c. ☒ Failure to promote me
- d. ☐ Failure to accommodate my disability
- e. ☒ Terms and conditions of employment differ from those of similar employees
- f. ☒ Retaliation
- g. ☒ Harassment
- h. ☐ Other conduct (please specify):

i. Did you complain about this same conduct in the charge of discrimination, referred to in number 6 above?

☒ Yes ☐ No

except for promotion and co-worker relationship

9. I believe that I was discriminated against because of my (check all that apply):

- a. ☒ Race
- b. ☐ Religion
- c. ☒ National origin

- d. ☒ Color
- e. ☐ Gender
- f. ☐ Disability
- g. ☐ Age (my birth year is: _____)
- h. ☐ Other (please specify):

- i. Did you state the same reason(s) in the charge of discrimination, referred to in number 6 above?

☒ Yes ☐ No

Describe in the space provided below the basic facts of your claim. The description of facts should include a specific explanation of the conduct that you believe is discriminatory and describe how each defendant is involved in the conduct (i.e. how, where, and when). Each paragraph must be numbered separately, beginning with number 10. Please write each allegation of discrimination in a separately numbered paragraph.

10. The office told me that my language is a demand type, then at work place, I notice that my work load is significantly higher than workers in another language group. I suggested to managers to hire additional workers of my language, but managers hired none in my language group.
- My co-worker in the same building made inappropriate comments to me because of my race and ethnicity. Later my co-workers had work-place hostile incidents with me. I reported problems to the manager. The manager fired me because of incidents but did not discipline other involved employees.

Attach additional sheets of paper as necessary.

Check here if additional sheets of paper are attached: ☐

Please label the attached sheets of paper as Additional Facts and continue to number the paragraphs consecutively.

REQUEST FOR RELIEF

State briefly and exactly what you want the Court to do for you and the amount of monetary compensation, if any, you are seeking.

I ask the court to reinstate my employment with
Marthi Inc. at a management position
and
award me one million dollars monetary compensation.

Date: 7/31/2018


Signature of Plaintiff

Mailing Address Lot 2304
P.O. Box 17370
Saint Paul, MN 55117

Telephone Number 612-239-8426

Note: All plaintiffs named in the caption of the complaint must date and sign the complaint and provide his/her mailing address and telephone number. Attach additional sheets of paper as necessary.